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October 1, 2012

Mr. Mark Ruggiero, District Ranger
Coronado National Forest, Sierra Vista District
4070 S. Avenida Saracino
Hereford, Arizona 85615

RE: Collaborative Alternative Team (CAT) Final Comments

Dear Mr. Ruggiero,

Thank you for the opportunity to provide comments regarding the U.S. Forest Service's (Service) proposal to comply with *The Travel Management; Designated Routes and Areas for Motor Vehicle Use Plan* adopted by the Department of Agriculture on December 9, 2005, for the Whetstone and Huachuca EMAs. The Sierra Vista District's proposed action contains change of status on over 700 routes including changing designation, decommissioning, and restricting these routes to meet the management goals of the Service. The process of meeting consensus on any changes to the proposed Service actions involved the CAT team and the U.S. Institute for Environmental Conflict Resolution. At the September 22, 2012 meeting in Sierra Vista, the CAT team agreed that this process was not functioning as intended and consensus among the team was unreachable. The CAT team further agreed to discontinue the collaborative process for the Whetstone and Huachuca EMAs.

The County had two Core CAT members involved during this process, and wishes to express and echo public concern about the potential impacts caused by these proposed actions. The forest road system is important to a wide variety of forest users and uses including hunting, hiking, picnicking, camping, ranching, prospecting, off-highway vehicles, 4-wheel drive vehicles, and those who simply enjoy driving through the forest. Many of the proposed changes are addressing historic routes through the forest that have been in existence for many years.

As you know, there are currently very few ways to access the entire Whetstone mountain range. Until the Service establishes public access for this area, the County agrees with the majority of the CAT team that the proposed closure or the restriction of any roadway in the Whetstone EMA be avoided.

The actions proposed include closing many ‘spur’ roads, which provide opportunity for camping and as pullouts for vehicles which help to prevent congestion of the main roads. If closed, users will be forced to park on the main roads, causing safety hazards. The impact of these spur roads to the forest service road system are minimal because of their short length and when compared to their available use, should remain open.

Furthermore, many of the roads included in this proposal are ‘loop’ or ‘connector’ roads, which provide a link between two roads. Closing these roads is not only an inconvenience, but doubles the mileage for hunters or other users who will be forced to drive into an area for several miles, backtrack and then repeat the process on the other road.

Many of the roads proposed to be closed cite that they are “located on soils that are generally steep and erodible”. However, they provide direct access to areas that are difficult to reach without vehicles and impossible to reach for those with limited or impaired mobility. These roads have existed for many years and without clear evidence of dangerous erosion, should not be permanently closed.

There are many roads that are being proposed for restricted use. These roads provide access to areas they serve, and if closed will limit public access to large areas of the forest. It is the County’s position that all roads should remain unrestricted, and if traveled by the Forest Service, Border Patrol, and grazing permittees, it is reasonable to allow the public to also travel them. The vast areas of National Forest land that are being addressed in this travel management plan include many areas for dispersed and large group camping opportunities. Closing roads that access large relatively flat areas will prevent those with limited or impaired mobility from enjoying these activities.

It appears that many roads are being proposed for closure to enlarge the existing Miller Peak Wilderness Area. It is the County’s position that this area should not be enlarged by simply closing roads, thereby creating ‘unauthorized’ or ‘de facto’ wilderness areas. Section G.2.A of the Cochise County Comprehensive Plan reads:

“Wilderness management must provide for continued and reasonable access for holders of property rights within the area and provide for full use and enjoyment of these rights.”

Furthermore, Section G.2.B of the Plan reads:

“No special designations or management plan should be proposed until it is determined and substantiated by reproducible scientific data, that there is a need for the designation, that protections cannot be provided by well-planned and managed development, and the area in question is unique when compared to other area lands.”

A Goal of the Plan is to “protect the culture, history, economy, environment and lifestyles of Cochise County residents by requiring federal agencies to coordinate land use plans with Cochise County and to establish plans that provide for continued multiple use of public lands...”

The County vehemently opposes what appears to be an effort to expand wilderness areas in the Huachuca EMA without the benefit of formal Legislative and Executive review.

Again, we thank you for the opportunity to express our concern over the proposed actions as they relate to access for the Public to the Public lands in our jurisdiction. Please consider the comments above as you review the information related to each route and reach a determination on your proposal.

Sincerely,

Richard R. Searle
Chairman, Cochise County Board of Supervisors

Cc: Patrick G. Call, District 1 Supervisor
Ann English, District 2 Supervisor
Michael J. Ortega, County Administrator
James E. Vlahovich, Deputy County Administrator
Karen Riggs, Interim Community Development Director
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Public Lands Advisory Committee
Ken Salazar, Secretary, Department of the Interior
Jim Upchurch, Forest Supervisor, Coronado National Forest
Melissa Shafiqullah, Acting District Ranger, Douglas District
Pat Lewis, Sr. Program Associate, U. S. Institute for Environmental Conflict Resolution
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